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Attorneys for Defendant,

Yakov Shaakov,

Plaintiff,

V.

Experian Information Solutions, Inc., Equifax
Information Services, LLC; Timepayment Corp.,
Synchrony Financial dba SYNCB/Sam Ash Music
Freedom Financial Asset Management, LLC dba
Freedom Plus,

Defendants.

CASE NO.: 2:22-CV-001646

**STIPULATION TO EXTEND TIME
FOR DEFENDANT FREEDOM
FINANCIAL ASSET MANAGEMENT,
LLC dba FREEDOM PLUS TO FILE
RESPONSE TO COMPLAINT**

Yakov Shaakov (“Plaintiff”), by and through his counsel of record, and Defendants Freedom Financial Asset Management, LLC dba Freedom Plus (“Defendant”) have agreed and stipulated to the following:

WHEREAS, on September 28, 2022, Plaintiff filed a Complaint for damages under FCRA, 15 U.S.C. section 1681. [ECF Dkt. 1].

WHEREAS, the Complaint was served on September 30, 2022.

WHEREAS, Defendant's original deadline to respond to the Complaint was October 21, 2022.

1 WHEREAS, Plaintiff and Defendant engaged in early discussions to evaluate the
2 allegations and possible settlement, informally agreed to extend Defendant's deadline to respond,
3 and now desire to further extend Defendant's deadline to respond to the Complaint for a period
4 of two (2) weeks in order for parties to further evaluate the allegations and responses, including
5 possible settlement discussions.

6 NOW, THEREFORE, the parties hereby request this Court to further extend the date for
7 Defendant to respond to the Complaint is extended until **December 10, 2022**.

Dated this 30th day of November, 2022 HUTCHISON & STEFFEN, PLLC <u>/s/Michael Brooks</u> Michael R. Brooks, Esq. (7287) Peccole Professional Park 10080 W. Alta Drive, Suite 200 Las Vegas, NV 89145 702-385-2500 mbrooks@hutchlegal.com <i>Attorneys for Defendant</i> <i>Freedom Financial Asset Management, LLC</i>	Dated this 30th day of November, 2022 KIND LAW <u>/s/Michael Kind</u> Michael Kind, Esq. (13903) 8860 South Maryland Parkway, Suite 106 Las Vegas, NV 89123 702-337-2322 mk@kindlaw.com <i>Attorneys for Plaintiff</i> <i>Rosalina Shaakov</i>
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ORDER

17 Upon stipulation of the parties and for good cause appearing therefore, IT IS HEREBY
18 ORDERED as follows:

Deadline for Defendant to respond to the Complaint is December 10, 2022.

IT IS SO ORDERED

NO FURTHER EXTENSIONS WILL BE GRANTED.

21 Dated: December 2, 2022



United States Magistrate Judge